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NOTICE OF EX PARTE

November 15, 2013

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

*Re: Numbering Policies for Modern Communications, WC Docket No. 13-97; IP-Enabled Services, WC Docket No. 04-36; Telephone Number Requirements for IP-Enabled Services Providers, WC Docket No. 07-243; Telephone Number Portability, CC Docket No. 95-116; Developing a Unified Inter-carrier Compensation Regime, CC Docket No. 01-92; Connect America Fund, WC Docket No. 10-90; Numbering Resource Optimization, CC Docket No. 99-200*

Dear Ms. Dortch:

On November 13, 2103, Jeff Lanning and Mary Retka (by phone) of CenturyLink met with Henning Schulzrinne, Chief Technology Officer, and Lisa Gelb, William Dever, Randy Clarke, Richard Hovey, Marilyn Jones, Rhonda Lien, Tim Stelzig, John Visclosky and Sanford Williams of the Wireline Competition Bureau to discuss the above-captioned proceedings. On November 15, 2013, Jeff Lanning and Mary Retka (by phone) also met with Nicholas Degani of the Office of Commissioner Ajit Pai to discuss the same proceedings. In both meetings, the discussion revolved around interconnection arrangements to facilitate the trial of Voice over Internet Protocol (VoIP) providers accessing numbering resources directly.

Specifically, CenturyLink explained that it supports the VoIP Numbering Trial. In fact, the company was an original and consistent proponent of VoIP providers having direct access to numbers. To assess the impact of VoIP provider direct access to numbers in a trial, it is important to be able to track and measure traffic from the trial participants. CenturyLink explained that it has seen increased instances of robo-calling and the telecom equivalent of denial of service (TDOS) attacks associated with traffic from VoIP end points. In fact, as evidenced by the Rural Call Completion order, such visibility and record keeping is increasingly important across the network.

CenturyLink further explained that an industry standard approach to tracking and measuring traffic is to use separate trunks by provider and, in the case of local traffic, to route traffic where the Local Routing Number (LRN) and Operating Company Number (OCN) are consistent. When traffic from multiple providers is co-mingled on the same trunk it is hard or even impossible to track the traffic and identify where issues arose. Indeed, while Level 3 has complained in these dockets about having to establish separate trunks, Level 3 itself requires

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CenturyLink to purchase separate trunks when taking numbers for customers outside CenturyLink's ILEC service areas.

In the course of the discussion, CenturyLink explained that it does not cost much to establish separate trunks (around \$100/month) and CenturyLink is more than willing to waive any charges for the trial period. Nor does it take much time to set up the arrangements (the usual month-long period generally can be expedited considerably). In addition, establishing separate trunks by providers is a robust solution that will not require providers to establish different long-term arrangements after the trial is over. Finally, CenturyLink explained that it was unaware of any intercarrier compensation consequences of this approach, particularly as the proposed arrangements do not concern interexchange traffic or tariff arrangements.

In response to advocacy in these dockets from Level 3, CenturyLink agreed that it is, of course, true that routing practices have varied over time, and from carrier to carrier. In addition, given the myriad of carriers and clear federal policy direction against blocking traffic, comingling of traffic may occur without the knowledge or consent of the other carriers to interconnection arrangements. However, CenturyLink and other carriers do attempt to harmonize routing policies through the course of business, particularly as they deal with mergers and acquisitions. For example, CenturyLink and Level 3 have been working to adjust arrangements for traffic from Broadwing, which has been referenced in filings in these dockets, establishing separate trunks for the traffic in Minnesota on August 8, 2013.

Ultimately, the fact that there have been and continue to be examples of disparate treatment should not obscure or alter the basic proposition that establishing direct relationships, including separate trunks, will facilitate a better VoIP Numbering Trial and remove the need to establish separate long-term arrangements. It is also worth noting that the trial of IP provider direct access to numbers is separate from IP interconnection. In fact, the vast majority of the traffic from VoIP customers in the trials will still terminate in TDM.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this notice is being filed in the above-referenced dockets. Please contact me if you have any questions.

Sincerely,

/s/ Jeffrey S Lanning

Copy via email to:

Henning Schulzrinne  
Nicholas Degani  
Lisa Gelb  
William Dever  
Randy Clarke  
Richard Hovey  
Rhonda Lien  
Tim Stelzig  
John Visclosky  
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